

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARON JAY JACKSON,

Defendant.

22-CR-55

Case No. 22-CR-

[18 U.S.C. §§ 1591(a)(1) & (b)(2), 2421(a),
2422(a), 2423(a), 2251(a), 2252A(a)(1) &
2252A(a)(5)(B)]

Green Bay Division

INDICTMENT

COUNT ONE

(Interstate Transport for Prostitution)

THE GRAND JURY CHARGES THAT:

Between approximately February 2019 and June 30, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, the State and Eastern District of Michigan, the State and District of Minnesota, the State and District of North Dakota, and elsewhere,

JARON JAY JACKSON

knowingly transported an individual, AV-1, in interstate commerce, with the intent that AV-1 would engage in prostitution.

In violation of Title 18, United States Code, Section 2421(a).

COUNT TWO
(Interstate Enticement for Prostitution)

THE GRAND JURY FURTHER CHARGES THAT:

Between approximately February 2019 and June 30, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, the State and Eastern District of Michigan, the State and District of Minnesota, the State and District of North Dakota, and elsewhere,

JARON JAY JACKSON

knowingly persuaded, induced, and enticed an individual, AV-1, to travel in interstate commerce, with the intent that AV-1 would engage in prostitution.

In violation of Title 18, United States Code, Section 2422(a).

COUNT THREE
(Sex Trafficking of a Minor)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on approximately May 10, 2019, and continuing until approximately June 6, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, the State and Eastern District of Michigan, and elsewhere,

JARON JAY JACKSON,

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, and obtain by any means JV-1, knowing that JV-1 would engage in a commercial sex act, knowing and recklessly disregarding that JV-1 had not yet attained the age of 18 years, and having had a reasonable opportunity to observe JV-1, who had not attained the age of 18 years.

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

COUNT FOUR

(Transportation of a Minor with Intent to Engage in Prostitution)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on approximately May 10, 2019, and continuing until approximately June 6, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, the State and Eastern District of Michigan, and elsewhere,

JARON JAY JACKSON

knowingly transported a minor, JV-1, in interstate commerce, with the intent that the minor would engage in prostitution.

In violation of Title 18, United States Code, Section 2423(a).

COUNT FIVE
(Production of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

1. Beginning on approximately May 16, 2019, and continuing until approximately June 30, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, and elsewhere,

JARON JAY JACKSON

employed, used, and persuaded a minor, JV-1, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction was and would be transported across state lines.

2. The visual depictions that Jackson produced and transported include digital videos that depict JV-1 performing oral sex on Jackson, identified by the following partial file names: IMG_6164.MP4, IMG_6165.MP4, and IMG_6166.MP4.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT SIX
(Transportation of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about June 30, 2019, in the State and Eastern District of Wisconsin and the State and Northern District of Illinois,

JARON JAY JACKSON

knowingly transported child pornography, as defined in 18 U.S.C. § 2256(8)(A), using a means and facility of interstate commerce.

2. The child pornography that Jackson transported include digital videos depicting a minor, JV-1, performing oral sex on Jackson, identified by the following partial file names: IMG_6164.MP4, IMG_6165.MP4, and IMG_6166.MP4.

All in violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT SEVEN
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about June 30, 2019, in the State and Eastern District of Wisconsin,

JARON JAY JACKSON

knowingly possessed material that contained images of child pornography, as defined in 18 U.S.C. § 2256(8)(A), which was transported using a means and facility of interstate commerce, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

2. The child pornography that Jackson possessed include digital videos depicting a minor, JV-1, performing oral sex on Jackson, identified by the following partial file names: IMG_6164.MP4, IMG_6165.MP4, and IMG_6166.MP4.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT EIGHT
(Sex Trafficking of a Minor)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on approximately May 16, 2019, and continuing until approximately May 24, 2019, in the State and Eastern District of Wisconsin, and the State and Northern District of Illinois,

JARON JAY JACKSON,

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, and obtain by any means JV-2, knowing that JV-2 would engage in a commercial sex act, knowing and recklessly disregarding that JV-2 had not yet attained the age of 18 years, and having had a reasonable opportunity to observe JV-2, who had not attained the age of 18 years.

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

COUNT NINE

(Transportation of a Minor with Intent to Engage in Prostitution)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on approximately May 16, 2019, and continuing until approximately May 24, 2019, in the State and Eastern District of Wisconsin, and the State and Northern District of Illinois,

JARON JAY JACKSON

knowingly transported a minor, JV-2, in interstate commerce, with the intent that the minor would engage in prostitution.

In violation of Title 18, United States Code, Section 2423(a).

FORFEITURE NOTICE

1. Upon conviction of one or more offenses in violation of 18 U.S.C. §§ 2421, 2422, & 2423, set forth in Counts One, Two, Four, and Nine of this Indictment, the defendant shall forfeit to the United States of America, pursuant to 18 U.S.C. § 2428, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

2. Upon conviction of one or more offenses in violation of 18 U.S.C. § 1591, set forth in Counts Three and Eight of this Indictment, the defendant shall forfeit to the United States of America, pursuant to 18 U.S.C. § 1594, any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

3. Upon conviction of one or more offenses in violation of 18 U.S.C. §§ 2251 & 2252A, set forth in Counts Five through Seven of this Indictment, the defendant shall forfeit to the United States of America, pursuant to 18 U.S.C. § 2253, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

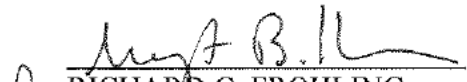
4. If any of the property described above, as a result of any act or omission by a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be

subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL: 


FOREPERSON

Dated: 3/1/2022


for RICHARD G. FROHLING
United States Attorney